

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

2004 NOV -1 A 10: 27

Illinois Bell Telephone Company

vs.

1-800 Reconex, Inc., et al

Complaint pursuant to Section 10-108 of
the Illinois Public Utilities Act 220 ILCS
5/10-108 and 83 Illinois Administrative
Code 200.170

CHIEF CLERK'S OFFICE

Docket 04-0606

**MOTION OF QWEST COMMUNICATIONS CORPORATION AND QWEST
INTERPRISE AMERICA, INC. TO DISMISS OR, IN THE ALTERNATIVE,
TO REQUIRE A BILL OF PARTICULARS AND A MORE SUFFICIENT PLEADING**

Pursuant to 83 Admin Code 200.190, Qwest Communications Corporation ("QCC") and Qwest Interprise America, Inc., formerly US West Interprise America, Inc. ("QIA") (collectively "Qwest"), by their attorneys, move to dismiss the above-captioned Complaint filed by SBC Illinois ("SBC") at the Illinois Commerce Commission ("Commission") as it pertains to Qwest. Qwest bases this Motion to Dismiss on the fact that the Complaint for resolution of "disputes" is not ripe for consideration by the Commission. In turn, should the Motion to Dismiss not be granted, Qwest requests that the Commission alternatively treat this as a Motion for a Bill of Particulars and a request for more sufficient pleading under Section 200.190(a) of the Commission Rules, in order to allow Qwest to prepare and submit its Answer to the Complaint.

In support of this Motion, Qwest states as follows:

I. MOTION TO DISMISS

Basically, SBC has filed a Complaint asking that the Commission not only approve its proposed amendment language "as sufficient to conform interconnection agreements to

governing law related to SBC Illinois' section 251 unbundling obligations", but also direct the CLECs to "incorporate this approved amendment into their interconnection agreements expeditiously",¹ in order "to end the unreasonable and unlawful propagation of vacated unbundling rules and contract requirements".² With regard to Qwest, SBC has initiated this Complaint prematurely.

In particular, SBC has not given Qwest an appropriate opportunity to negotiate changes to its interconnection agreements with SBC pursuant to any of the various unbundling decisions from the Federal Communications Commission ("FCC") or the District of Columbia District Court (collectively "TRO decisions"). Accordingly, Qwest submits this Motion to Dismiss to address SBC's failure to provide an actual controversy ripe for review by the Commission.

Qwest has not sought to continue "unreasonably" or "unlawfully" the unbundling arrangements in its interconnections agreements, which have been impacted by the TRO decisions. SBC has *never* attempted to engage Qwest in amending the interconnection agreements with the language in Exhibit B to the Complaint. The interconnection agreements between SBC and Qwest outline specific processes for initiating and undertaking good faith negotiation of amendments, as well as resolution of disputes. As SBC has previously explained,³ these processes must be undertaken before seeking relief on substantive issues from the Commission through the complaint process. SBC has failed to adhere to these processes, which

¹ *Illinois Bell Telephone Company vs. 1-800 Reconex, Inc., et al Complaint pursuant to Section 10-108 of the Illinois Public Utilities Act 220 ILCS 5/10-108 and 83 Illinois Administrative Code 200.170*, Docket 04-0606, Amended Complaint (Oct. 22, 2004) ("Amended Complaint") at 14.

² *Amended Complaint* at 13.

³ *Rhythms Links Inc. v. Illinois Bell Telephone Company*, Docket 99-0465, Order (1999) ("Ameritech argues that even if negotiations were not ongoing, Rhythms has a duty to address this dispute through the negotiation and other procedures required by both the Agreement and the 1996 Act, and cannot avoid that duty simply by filing a complaint.") (emphasis added); *McLeodUSA Telecommunications Services, Inc. v. Illinois Bell Telephone Company*, Docket 00-0107, Order (2000) (Illinois Bell argues that it is inappropriate to bring a complaint to amend an interconnection agreement prior to exhausting negotiations and the dispute resolution procedures in accordance with the agreement).

makes the Commission granting the relief on the substantive issues prayed for in this Complaint not ripe for adjudication.

Because Qwest had never been provided the amendment language now proposed in Exhibit B, SBC and Qwest have reached an "impasse" in negotiating the amendment, as SBC asserts. Regardless, various personnel from Qwest and SBC have had numerous communications over the past few months about their interconnection agreements. As with standard negotiations of interconnection agreements and associated amendments, when parties have discussions they use that opportunity typically to inquire about the progress of all related outstanding issues, including outstanding amendments. SBC has had numerous opportunities, before bringing a Complaint before the Commission, to have inquired about when or how Qwest intended to respond to its alleged request for negotiations. SBC neglected to utilize those opportunities, which further indicates that SBC has not sought good faith negotiations of an amendment of the interconnection agreements with Qwest to reflect the TRO decisions.

Simply put, SBC never attempted to engage Qwest in good faith negotiations to amend their interconnection agreements in Illinois according to the terms of those interconnection agreements. Nonetheless, Qwest remains willing to enter into negotiations pursuant to the terms of the interconnection agreements and Section 252 of the Telecommunications Act of 1996. However, SBC has ignored several requests by Qwest for a version of the amendment in Exhibit B that Qwest could redline to begin negotiations. If the Commission denies the Motion to Dismiss filed by Qwest, and allows SBC to proceed with its Complaint, there will be no opportunity for good faith negotiations of an amendment to the interconnection agreements to reflect the TRO decisions. Accordingly, the Complaint as to Qwest should be dismissed with prejudice for failure to provide an actual controversy ripe for review by the Commission.

II. BILL OF PARTICULARS

SBC's Complaint lacks specific detail necessary to allow Qwest to prepare a response to the vague allegations, much less provide the Commission with direction on how to proceed with a reasonable investigation of this matter. At a minimum, the defects which must be corrected to allow for the matter to proceed include:

- (1) the exact date, format (i.e., US mail, overnight delivery, electronic mail) used, and the person(s) contacted to provide both QCC and QIA the alleged written notice immediately following the effective date of the *Triennial Review Order* in October of 2003;
- (2) the exact date, format (i.e., US mail, overnight delivery, electronic mail) used, and the person(s) contacted to provide both QCC and QIA the alleged written notice immediately following the issuance of the *USTA II* decision in June of 2004;
- (3) the dates upon which the proposed language reflecting both the *Interim Order* and the *USTA II* decision, as identified in Exhibit B of the Complaint, was provided to both QCC and QIA.

Without the aforementioned information, it is impossible to conduct any review of the vague allegations made by SBC. For these reasons, if this Motion to Dismiss is not granted, Qwest requests that the Commission order SBC to produce a bill of particulars and submit a more sufficient pleading.

CONCLUSION

For these reasons as well as those outlined in Qwest's Answer to the Complaint filed on October 11, 2004, Qwest respectfully requests that the Complaint of SBC as to Qwest be dismissed. Should the Commission not grant this Motion to Dismiss, Qwest requests that the Commission, in the alternative, order SBC to submit a bill of particulars and a more sufficient pleading consistent with the recommendations contained in this Motion.

Respectfully submitted,

**QWEST COMMUNICATIONS CORPORATION
AND QWEST INTERPRISE AMERICA, INC.**

By:



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Dated: November 1, 2004

VERIFICATION

STATE OF COLORADO

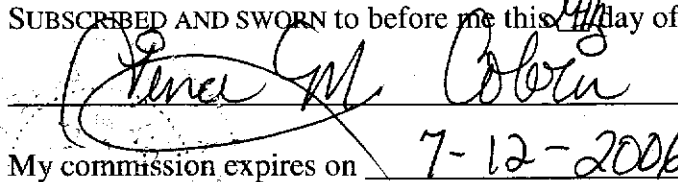
COUNTY OF DENVER

I, Kristin L. Smith, being duly sworn, deposes and states that she is an attorney representing Qwest Communications Corporation and Qwest Interprise America, Inc., that she has read the Motion to Dismiss or, in the Alternative, to Require a Bill of Particulars and a More Sufficient Pleading in Docket No. 04-0606, and knows the content thereof, and that the statement therein contained are true, to the best of her knowledge, information and belief



Kristin L. Smith

SUBSCRIBED AND SWORN to before me this 24th day of October, 2004.

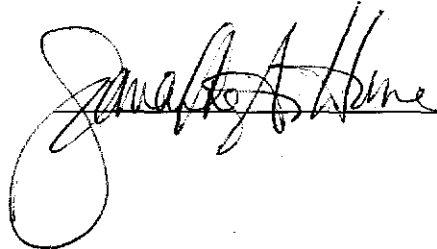


My commission expires on

7-12-2006

CERTIFICATE OF SERVICE

I, Samantha A. House, do hereby certify that I have, on this 1st day of November 2004 caused to be served upon the following individuals, by e-mail, a copy of the foregoing Appearance on behalf of Qwest Communications Corporation and Qwest Interprise America, Inc. in Docket 04-0606.

A handwritten signature in cursive script, appearing to read "Samantha A. House", written over a horizontal line.

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